IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

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Case No: 3: INCV203

LARRY MANLEY,)
Plaintiff,)
v.)
FEDERAL NATIONAL MORTGAGE ASSOCIATION; LIVEWELL FINANCIAL, INC.; and ATLANTIC LAW GROUP, LLC,	
Defendants.))

NOTICE OF REMOVAL

In accordance with 28 U.S.C. § 1441(a), Defendants Federal National Mortgage
Association ("FNMA") and LiveWell Financial, Inc. ("LiveWell") hereby remove the abovecaptioned lawsuit from the Circuit Court for the City of Hopewell, Virginia, where it is currently
pending, to the United States District Court for the Eastern District of Virginia. As grounds for
the removal of this case, FNMA and LiveWell state as follows:

- 1. On or about February 3, 2014, Plaintiff Larry Manley ("Manley") commenced this action by filing a Complaint in the Circuit Court for the City of Hopewell, Virginia, Civil Action No. CL14000046-00.
- 2. In his Complaint, Manley alleges conspiracy, quiet title, and three causes of action under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").
- 3. Causes of action alleged pursuant to the FDCPA arise under the laws of the United States, conferring federal question jurisdiction in federal courts. 28 U.S.C. § 1331.

4. This Court has original jurisdiction over this matter pursuant to 28 U.S.C. § 1331. This matter is thus one that may be removed to this Court pursuant to 28 U.S.C. § 1441(a).

5. This Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b). FNMA was served with a copy of the Complaint on or about March 13, 2014. LiveWell was served with a copy of the Complaint on or about March 19, 2014.

6. Defendant Atlantic Law Group, LLC, has consented to removal.

7. The Circuit Court for the City of Hopewell is located within the Eastern District of Virginia and, therefore, venue is proper in this Court because it is the "district and division embracing the place where such action is pending." 28 U.S.C. § 1441(a).

8. In accordance with 28 U.S.C. § 1446(a), a copy of the Complaint served on the Defendants is submitted herewith. *See* Exhibit A, attached hereto.

9. Upon the filing of this Notice of Removal, FNMA and LiveWell shall furnish written notice thereof to Plaintiff, and shall file and serve a copy of this Notice with the Clerk of the Circuit Court for the City of Hopewell pursuant to 28 U.S.C. § 1446(d).

Dated: March 20, 2014 Respectfully submitted,

WEINER BRODSKY KIDER PC

By:

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Counsel for Defendants Federal National Mortgage Association and LiveWell Financial, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of March, 2014, a copy of the foregoing Notice of Removal was served upon the following parties and counsel of record by first class mail:

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